

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
NAJELA DRICE,

Case No.: 15 cv 395 (MKB) (MDG)

Plaintiff,

- against -

MY MERCHANT SERVICES, LLC, and
JOSE A. VALERIO, *individually*,

Defendants.

-----X
NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the annexed memorandum of law, the annexed declaration of Casey Wolnowski, Esq. and all prior proceedings had herein, a motion will be made by Plaintiff before Hon. Margo K. Brodie to be held at the U.S. Courthouse (E.D.N.Y.), 225 Cadman Plaza East, Brooklyn, New York 11201, at a date and time to be determined by the Court, for an Order:

- a) Granting Plaintiff's Motion for Default Judgment pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure; and
- b) For such further relief as this Court may deem just and proper.

Dated: New York, New York
April 21, 2015

**PHILLIPS & ASSOCIATES,
ATTORNEYS AT LAW, PLLC**

By:


Casey Wolnowski, Esq.
Attorneys for Plaintiff
45 Broadway, Suite 620
New York, New York 10006
(212) 248-7431
cwolnowski@tpglaws.com